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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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U.S. SECURITIES AND EXCHANGE :
COMMISSION : 04 CV 02322 (GEL)
Plaintiff, :

v. : DEFENDANT GEORGE
: SANDHU'S FIRST
: REQUEST
: FOR DOCUMENTS
UNIVERSAL EXPRESS, INC., RICHARD A. :
ALTOMARE, CHRIS G. GUNDERSON, MARK :
S. NEUHAUS, GEORGE J. SANDHU, SPIGA, :
LTD., and TARUN MENDIRATTA, :
Defendants. :
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Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Local Civil
Rule 26.3, and the Order of the Court dated March 21, 2005, Defendant George J. Sandhu
hereby requests that Plaintiff produce for inspection and copying, at the offices of
Pickholz Law Firm LLP, 570 Lexington Avenue, 45th floor, New York, New York
10022, on or before July 29, 2005 all documents described below.

DOCUMENTS REQUESTED

1. To the extent not previously produced, any and all documents evidencing, concerning, reflecting, or relating to (a) the Complaint in this action, (b) the allegations contained therein, (c) any of the named defendants, (d) George J. Sandhu, (e) any individuals with knowledge of the foregoing and/or whom plaintiff may call as witnesses at trial, and (f) any expert witnesses the plaintiff may call at trial. This request does not call for or require the production of documents that are subject to the attorney-client privilege or the attorney work product doctrine.

INSTRUCTIONS

1. If any document request herein cannot be complied with in full, it shall be complied with to the extent possible, with an explanation as to why full compliance is not possible. In the event that any document called for by these requests is withheld on the basis of a claim of privilege, that document is to be identified in the manner required by Fed. R. Civ. P. 26(b)(5) and Local Civil Rule 26.2.

2. The document requests herein call for documents that were dated or created, or came into your possession, custody or control at any time during the period from January 1, 2000 to the present, except where otherwise noted.

3. The document requests herein are continuing in nature. If at any time any documents are obtained in addition to those that have previously been produced to Defendant, prompt supplementation of such responses to these requests is required.

4. Each document is to be produced (along with all drafts thereof) in its entirety, without abbreviation, expurgation, or redaction. In the event that a copy of a document, the production of which is requested, is not identical to any other copy thereof,

by reason of any alterations, marginal notes, comments, or material contained therein or attached thereto, or otherwise, all such non-identical copies shall be produced separately.

5. If no documents or things exist that are responsive to a particular paragraph of these requests, so state in writing.

Dated: May 23, 2005
New York, New York

PICKHOLZ LAW FIRM LLP

By: 
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